

STATE OF SOUTH CAROLINA

(Caption of Case)

Petition of Frontier Communications of the Carolinas Inc. for Waive of SC Regulation 103.631(B) Regarding the Distribution of Telephone Directories

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

COVER SHEET

DOCKET

NUMBER: 2012 - ____ - ____

(Please type or print)

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DOCKETING INFORMATION (Check all that apply)

☐ **Emergency Relief demanded in petition** ☐ **Request for item to be placed on Commission's Agenda expeditiously**

☐ **Other:** _____

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)			
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input checked="" type="checkbox"/> Request	
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio	
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigator	
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement	
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment	
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter	
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response	
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery	
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition	
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation	
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena	
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff	
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:	
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest		
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit		
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report		

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Petition of Frontier Communications of)
the Carolinas Inc. for Waiver of SC)
Regulation 103.631(B) Regarding the)
Distribution of Telephone Directories)
_____)

**FRONTIER COMMUNICATIONS OF THE CAROLINAS INC.'S REQUEST
FOR AND NOTICE OF WAIVER OF SC REGULATION 103.631(B)
REGARDING THE DISTRIBUTION OF TELEPHONE DIRECTORIES**

Frontier Communications of the Carolinas Inc. ("Frontier") respectfully submits this notice and requests pursuant to its authority under Regulation 103-601(3) that the South Carolina Public Service Commission ("Commission") grant Frontier a waiver of the provision of Regulation 103-631(B) that requires the distribution of a printed residential white page directory to all customers served by that directory. Frontier further seeks to inform the Commission as new telephone directories covering selected areas are printed and distributed in South Carolina by Frontier. As explained in more detail below, Frontier will provide notification that reaches both Frontier and Competitive Local Exchange Carrier (CLEC) customers in affected local exchange areas, and Frontier will issue a bill message notifying its customers of the changes and their options. If this requirement is waived, the options for Frontier's customers, who want a copy of the residential white pages directory listings, are the choice of receiving on demand a copy of the residential white pages directory listings in those affected areas either in the printed bound format or in the CD-ROM format. Frontier will also provide free on-line access to residential white pages listings via the Internet. Frontier will continue the delivery of physical directories to its customers that include business and government listings, yellow pages,

emergency information, consumer guide pages, and other required informational material including their ability to obtain a free copy of the printed residential white pages.

I. REASONS SUPPORTING THIS CUSTOMER CHOICE

For years, the residential white page directory was likely one of the most utilized books, and it served its purpose well. Technological advances, such as Internet directories and the directories in wireless and wireline devices, have made customers much less reliant on, and interested in, printed residential white page directories. In fact, customers are now turning less and less to the bound paper copy of the residential white page directory and are instead looking to online and other resources for listing information. Frontier is committed to carry out its public service responsibilities in a manner that conserves natural resources, lessens its “carbon footprint” and reduces waste. Frontier proposes to adopt a more customer-focused and environmentally conscious approach to the distribution of residential white page directories.

If granted this waiver, Frontier will distribute residential white pages directories on demand to customers who request one, in either print or CD-ROM format. Frontier will also provide free on-line access to residential white pages listings via the Internet. Frontier will continue the delivery of physical directories that include business and government listings, yellow pages, emergency information, consumer guide pages, and other required informational material. These directories will continue to be published and delivered to all customers annually by Frontier’s directory publisher, SuperMedia. SuperMedia will continue to deliver these smaller directories to CLEC customers residing in Frontier’s local exchange areas pursuant to Frontier’s various Interconnection Agreements.

II. CURRENT REQUIREMENTS AND AUTHORITY OF STATE LAW ALLOW FOR THE ABILITY TO PROVIDE CUSTOMER CHOICE

The Commission's rules and regulations require Frontier to distribute a directory that contains residential listings:

SC Code of Regulations 106-631(B):

Upon issuance of the directory in which its customers' listings appear, each utility is responsible for distributing a copy of each directory to all customers served by that directory and a copy of each directory shall be furnished to the Commission.

In accordance with this regulation, Frontier currently provides customers with printed residential white page directories that include an alphabetical listing of all residential customers with published numbers. Frontier also provides customers with printed directories that include business and government white pages, yellow pages and consumer guide pages. In recent years, customers have been using printed residential white page directories less and less in favor of alternate methods of accessing listings, such as Internet directories, the directories in wireless or wireline devices, and the specialized directories provided by employers, schools, places of worship and other organizations. Gallup studies show that the percentages of households using stand-alone residential white pages dropped from 25% in 2005 to only 11% in 2008.

Due to diminishing use of the printed residential directories and the growing use of substitutes, numerous other states have authorized alternatives to the mandatory delivery of printed residential white page directories to all households and customers. Notably, the New York Public Service Commission ("NY PSC") has granted Frontier's request for a waiver of the NY PSC's requirement to distribute hard copies of its residential white pages directories, provided that any customer who wants to receive a hard copy of the residential white pages will be able to obtain it on request, and provided that Frontier must offer its customers free on-line

access to the residential white pages. The NY PSC adopted its Staff's recommendations verbatim, which stated in part as follows:

Advances in technology provide numerous alternatives to use of residential white pages for obtaining telephone numbers. Many options are available for locating a residential telephone number; and residential white pages are not as valuable and essential as they were years ago. The elimination of residential white pages not only reduces the negative environmental impact (by using less paper and ink) but also decreases costs.

The regulatory requirement of distributing residential white page listings is being relaxed, not only in New York, but across the country. Staff concurs with the Frontier Companies that discontinuing the blanket distribution of residential white pages will eliminate the need to use natural resources and reflects an environmentally conscious approach. Although elimination of the blanket distribution of the residential white page listings provides significant benefits, some consumers do not have access to alternative listing services, due to lack of broadband availability, or cannot afford Internet-based services, or are just more comfortable using the traditional and familiar directories. Under the Frontier Companies' proposal, those customers will be able to obtain a residential directory (or a CD-ROM) on a regular basis for their use simply by requesting one. Other customers with access to the Internet may benefit from the availability of the Frontier Companies' free online residential white pages.

...

Customers today have many options in terms of locating telephone numbers; and future technologies may make this task even easier. Statistics suggest that telephone directories are not nearly as valuable to consumers as they were even a decade ago. In addition, telephone books, by their very nature, are large and cumbersome and utilize a significant amount of natural resources to produce and distribute. Given the notification requirements for all customers in the Frontier Companies' service territories to advise them of their options and the fact that any customer who wants to receive the residential white pages will be able to obtain them,¹

¹ *Petition of Frontier Communications Local Exchange Carriers for Waiver of the Requirements of 16 NYCRR, Section 602.10(b) Regarding the Distribution of Telephone Directories*, Case 12-C-0060, Order approving Staff Recommendations (May 22, 2012), pp. 4-5. The NY PSC had previously granted a similar petition by Verizon. *Petition of Verizon New York Inc. for Waiver of New York Code of Rules and Regulations, Title 16, §602.10(b) Pertaining to the Distribution of Telephone Directories*, Case 10-C-0215, Order Granting Waiver with Conditions Case (Oct. 15, 2010 ("New York Verizon Waiver Order")). Copies of the New York Frontier and Verizon Orders are attached. . See Exhibits "A" and "B".

Based upon the diminished utility and demand for printed residential white page directories, it is not a responsible use of resources for Frontier to continue providing these directories on an unsolicited basis to all households and businesses in its service territory without any regard for the customer's own choice based on his or her needs. Frontier is seeking, like many other carriers in the State, the authority to allow its customer to choose whether he or she wants a copy of the residential white page directory and then how he or she will receive a copy of the directory at no additional cost to the customer.

III. ACTIONS IN OTHER STATES

Frontier's research indicates that similar requests have been granted or are pending in at least 15 states.² For example, in some areas of Oklahoma, Ohio, South Carolina, Georgia and Florida, regulators have permitted AT&T to provide residential white page directories only upon customer request.³ Verizon instituted the same arrangement in Pennsylvania in 2010. In at least one state where AT&T has been permitted to provide white page directories on demand, very few customers, only approximately 2%, have actually requested a paper copy.⁴

The reasoning applicable to New York and these other states applies with equal force in South Carolina. Granting the waiver will have a material, positive effect on the environment. Frontier estimates that it would save in excess of 1.3 million pounds of paper per year by reducing the size of its directories, and in addition reduce the energy associated with printing, binding, and distributing the directories—thereby also lowering Frontier's "carbon footprint."

² http://www.usatoday.com/money/industries/telecom/2010-11-14-white-pages-dropped_N.htm, visited 1/31/12.

³ Verizon Waiver Order, *supra*, note 1, at p. 3. See Exhibit "B".

⁴ *Id.*

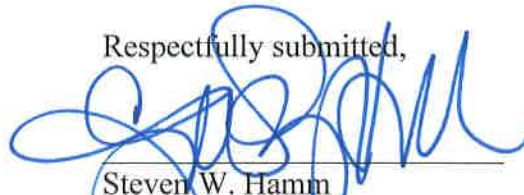
Frontier proposes to make this change of policy known to customers by a variety of methods, to include:

- Notice on the protective wrap of the business white pages;
- Separate notification card to be inserted in the business white pages;
- Notice in the business white pages table of contents;
- Notice and explanation in the front pages of the business white pages;
- Notice on Frontier's web site;
- Press release; and
- Bill message to Frontier customers.

Frontier encourages the Commission to expand to Frontier the environmentally conscious relief that will provide customers with residential white pages on demand. Not only will granting the waiver benefit the environment, it will also unburden customers who have no use for printed directories.

For the foregoing reasons, Frontier respectfully requests that the Commission grant this waiver.

Respectfully submitted,



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INC.

October 2, 2012

Columbia, South Carolina

ATTORNEY VERIFICATION

RICHARDSON PLOWDEN & ROBINSON, P.A.

C. JO ANNE WESSINGER HILL

_____(L.S.)
Notary Public for South Carolina
My Commission Expires: _____

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA**

IN RE: Petition of Frontier)
Communications of the Carolinas Inc. for)
Waiver of SC Regulation 103.631(B))
Regarding the Distribution of Telephone)
Directories)
_____)

CERTIFICATE OF SERVICE

This is to certify that I, C. Jo Anne Wessinger Hill, an attorney in the firm of Richardson Plowden & Robinson, PA, have on October 2, 2012, served one (1) copy of each of the foregoing document: Frontier Communications of the Carolinas Inc.'s Request for and Notice of Waiver of SC Regulation 103.631(B) Regarding the Distribution of Telephone Directories, in the above-referenced matter to the person(s) named below by causing said copy to be delivered as indicated below:

VIA ELECTRONIC MAIL SERVICE


The Honorable Jocelyn G. Boyd, Esquire
jocelyn.boyd@psc.sc.gov
Chief Clerk & Administrator
The Public Service Commission of South Carolina
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P.O. Drawer 11649
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VIA ELECTRONIC MAIL SERVICE AND

U.S. MAIL

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October 2, 2012
Columbia, South Carolina



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